

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

IN THE MATTER OF
BENTONVILLE POST OFFICE
BENTONVILLE, OH

Docket No. A2011-58

LINDA SUE NAYLOR REPLY TO
POSTAL SERVICE COMMENTS REGARDING APPEAL
(November 7, 2011)

The Postal Service reply of October 24, 2011 simply restates the concerns identified during the Proposal and Final Determination process and the Service's mere attempt to comply with "considerations" required by 39 U.S.C. §404(d)(2)(A). This is obvious in how many times the Service states the statute. It must also be obvious to the PRC based on how many times the Service has restated this position in all of the numerous cases on closing post offices now before the PRC.

The PRC must acknowledge the substantial weight now placed upon its shoulders to address the inefficiencies of the Post Office which have resulted in the efforts now underway. It is this petitioner's hope that the overriding law related to rural post offices specifically will not be lost in the process. That law states consideration must be given to compliance with the government policy established by law that the Postal Service must provide *maximum degree of effective and regular postal services to rural areas, communities and small towns where Post Offices are not self-sustaining.* And yes, this petitioner is repeating this plea as well.

The Service position fails to consider the **effect** of the "considerations" regardless of the cookie-cutter responses which give lip-service only to the very customers the Service ultimately needs. The failure of the Service to maintain the standards which are mandated by a policy of maximum degree of service may in fact be the crux of the problems of the entire Postal System. If customers were satisfied with service on whole, the service on whole would not be in the condition it is in. That the Service has fallen into the failure to care for the customer (and to the hands on customer service representatives at local post offices) is a major source of the failure of the System now trying to be addressed with "nickel and dime" type closings of highly service

oriented rural locations rather than real decision making to address inefficiencies of much larger scale in the major operating locations of the Postal Service. The fall off of \$700 of revenue in Bentonville Ohio is not contributory to the multi-million dollar cost and revenue problem of the System on whole. A single desk in Washington, DC could solve that concern. Causing Bentonville Ohio to lose its Post Office and combining the need for those customers served to congregate in a farther location, with much greater overhead requirements, and much less efficient (number of customers per employee) service really just complicates the inefficiencies and strain on services from the other location.

Consider more closely these arguments on "considerations" of closing the Bentonville Ohio PO:

1. Effect on Community

With respect to the complaints about the safety of rural delivery service, has it really been "considered" as the Service repeats in its reply?

The Bentonville customers have pointed out the concerns with safety of using a mail box on State highways. Remember two State highways converge through Bentonville. Also, the rural, narrow, winding, country roads cannot just be "considered" without acknowledging that traffic danger is real. With the Bentonville Ohio PO open, these highway and rural road dangers are not present. The effect of closing the PO is then MAKING THE COMMUNITY MORE AT RISK OF DANGER.

2. More Effect on Community

The Bentonville customers raised true concerns about the efficiency and security of doing post office business through their rural mailboxes. Right now a customer can pick up their mail, buy a stamp, and return a response by mail the same day at the Bentonville Post Office. The Service has suggested this can be accomplished at rural delivery mailboxes. Not really! First day, an order is placed for stamps and money must be left. Second day, the stamps are delivered. Third day, the return letter is then picked up. And this is only true if the money is not stolen or stamps are not taken from the rural mailbox in intervening times. THIS IS NOT MAINTAINING THE MAXIMUM DEGREE OF EFFECTIVE AND REGULAR POSTAL SERVICE TO THE RURAL AREA.

Again, don't just allow the Service's standard form of reply to be that the Service did "consider" the requirements of the U.S. Code, but look at the impact of the concerns. The action of closing the PO is detrimental to customers and community.

3. Effect on Employee

Taking the Service numbers as true, it costs \$1500 annually to replace the office with a rural carrier. The rental costs of the location have been \$1500 annually or less for many years now. So the DETRIMENTAL impact of the closing has to be TERMINATION of an employee in order to make the change economically viable. And the "non-career" position is just that simply because the Service has failed to previously address its responsibilities throughout the country in replacing retiring (or dying in the case of Bentonville Ohio) employees. The Service even suggests that the OIC may be relocated. Then this is no savings whatsoever. The current employee is a union employee with over 51 years of service. Yes, 51 years. This doesn't save money.

This significantly and adversely affects the employee and the community. Let's just be clear on the impact of the "consideration."

4. Other Concerns

This Petitioner has reported to the Public Representative and to the Commission in the Participant Statement that Bentonville rural customers have been contacted already by West Union Ohio Post Office delivery persons about West Union soon to take over the customers rural delivery routes. One such customer was given an old mailbox by a West Union carrier and instructed on where and how to put it up. Apparently, the indications that Manchester Ohio Post Office will serve the Bentonville Community are not exactly correct. This misrepresentation is not sanctioned by any legal procedure in this process and reflects the Service's cavalier attitude in "considerations" of the effect of their proposed action. The Commission should not let this procedure continue if representations of the Service regarding the combination of service with Manchester are not true and in fact some of the Bentonville customers are going to be required to deal with West Union Service. The Service has even itself admitted that West Union is in the Columbus District and Manchester is in the Cincinnati District which is a significant change of service for these customers.

The Service is not forthright or clear regarding the effect of closing the Bentonville PO. Initially, customers were told their Community name would be the same but their Zip Code would change to Manchester in their addresses. During the barrage of efforts by the Service to address a complete system failure by "nickel and dime" closing numerous rural locations, the Service published materials stating that rural zip codes could be maintained along with community identities in making addresses after the closings. See July 2011 Federal Register Final Rule Frequently Asked Questions. In just another example of not really "considering" what is happening here but just a System now bent on getting these closings done, the Service in its response to the appeal, in a footnote (p.10), says the Bentonville Zip Code must change.

The facts being reported in the Postal system's response are not accurate. There are two glaring examples: 1) the response reported in a footnote the proposed closing related to Bentonville, N.C. instead of Bentonville, Ohio; and 2) it also stated (the previous Postmaster of the Bentonville Post Office was recognized as being both the oldest and longest serving Postmaster in the United States) which is untrue as Mrs. Verna Naylor was the oldest Postmaster in the United States **and also** the oldest Postal Employee in the United States.

There are other factual statements which are questionable. One major issue is the information concerning the residential and business growth in Adams County from the Engineer's Office. I went to the Engineer's Office to get a copy of this information. I was told by Mr. Hughes that he received a telephone call from a Postal System representative asking him if he expected any business growth in Adams County. He answered "No". Mr. Hughes stated that he didn't recall being asked about the residential growth. He seemed surprised that this information was used for the purpose of closing the Bentonville Post Office. He also remarked, "I wonder why they didn't contact the Office for Economic Development." Adams County has such an office and, as its name suggests, economic development is a goal of the area.

The lip-service given to these issues is repeated over and over again in the Service response. Really, the Service heard and repeated but did not give deference to any statement of the customers at the initial Proposal and Final Determination considerations. The Service simply restated the issue and concluded without reason in the responsive statement on appeal that they have considered the legal requirements.

And this Commission is certainly aware of the repeated times the same things and same empty responses are being reiterated before the Commission as reason for the course of action

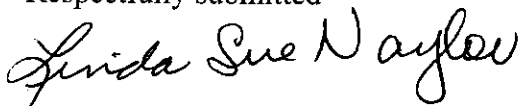
chosen as the remedy for ills of the Post Office. Those ills are much greater problems than relocating the OIC of the Bentonville PO or making several rural Ohio customers put up a mail box and put themselves at risk and their money at risk by going to the side of their dangerous roads over two or more days to accomplish what has been done in only one for so many years now. But, oh yes, they can still do it if they travel the same dangerous roads and highways to a larger, strange, less personal location and give up their own community identity.

It is a formidable task that the PRC is now faced with all of these reviews of Post Offices and proposed closings of mostly rural, small offices. As if the efficiencies of the whole system are remedied on consolidating the system. Many efficiencies of the postal service have been lost in consolidations already. Had this service paid attention to how small, rural locations actually served their customers, the service would have satisfied customers who would assist in the continuation of the service as a whole.

Given the current barrage of closings in front of this Commission, one has to be concerned if this Commission is going to be the one that history will reveal as the accommodation for the demise of the entire government postal system as it has existed. Obviously, given the repeated standardized treatments of each of the appeals now before and beginning to be reported out of the Commission, one could question why the effort is being expended in face of the probable outcome.

In this reply, this Participant makes these arguments because what has been addressed in this particular case has not been *considered* as it should have been. There are real detrimental effects to the closing of the Bentonville Post Office. The law says the mail service for rural areas MUST be provided at the MAXIMUM degree of effective and regular postal service. Maintaining the Bentonville Post Office in operation assures compliance with one location which specifically fulfills the substance of the language of that law.

Respectfully submitted

A handwritten signature in cursive script that reads "Linda Sue Naylor". The signature is written in dark ink and is positioned below the typed name.

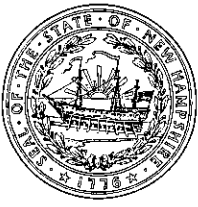
LINDA SUE NAYLOR

November 7, 2011

NOTE:

ATTACHED TO THIS REPLY IS A COPY OF A LETTER FROM REP. JANE B. JOHNSON, A NEW HAMPSHIRE STATE REPRESENTATIVE, ON BEHALF OF THE BENTONVILLE POST OFFICE. THE REPRESENTATIVE INFORMED ME SHE MAILED THIS LETTER TO THE PRC BUT IT DOES NOT SHOW UP ON THE APPEAL DOCKET.

ALTHOUGH I DO NOT HAVE A COPY, THE ADAMS COUNTY OHIO COMMISSIONERS ALSO SENT A LETTER TO THE PRC WHICH DOES NOT SHOW UP ON THE APPEAL DOCKET. THE SUBSTANCE OF THAT LETTER CHALLENGED THE POSTAL SERVICE CLAIM THAT THEY HAD CONTACTED ADAMS COUNTY OFFICIALS AND WERE INFORMED NO GROWTH WAS ANTICIPATED IN BENTONVILLE OR ADAMS COUNTY OHIO. I AM INFORMED THE COMMISSIONERS' LETTER CONTRADICTS THIS CLAIM.



State of New Hampshire

HOUSE OF REPRESENTATIVES

CONCORD

Secretary of the Postal Regulatory Commission
901 New York Avenue NW Suite 200
Washington, D.C. 20268-0001

September 23, 2011

To the Secretary of the Postal Regulatory Commission:

The news of the possible closing of the US Post Office in Bentonville, Ohio, 45105, has reached me in New Hampshire. I am very concerned. Bentonville is my hometown and was the home of my ancestors. It is a typical American small town, clustered around its churches, organizations, the village store, auto station, and especially, the Post Office. Many of the residents see one another on a daily basis, and if not, they are sure to check by phone or through communication with others. Most of the citizens are descended from families and bear surnames that have been common to the area for the last 200 years. They are proud of their heritage and sustain annual celebrations commemorating events, persons and establishments. In 1976, Bentonville celebrated the American Bicentennial and from that grew the annual Harvest Festival that has continued for 35 years. The Adams-County Anti-Horse Thief Society, founded in the 1800s and revived in the 1960s, stages an annual banquet and celebration in the spring. That organization has membership from all 50 states and from several countries due to its unique history. Bentonville has had its Post Office for over 100 years. Mrs. Verna Naylor was Post Master for 42 years and a few years ago, was honored as the oldest serving Post Master in the USA. The village of Bentonville is small and is situated on either side of a busy state highway, State Route 41, which intersects in the town with State Route 136. These highways are the routes to the Ohio River in Adams County as they lead to Manchester and Aberdeen and the bridges to Kentucky. There is a considerable amount of regular auto and truck traffic through the town. If the Post Office closed, residents would be inconvenienced by having to erect mailboxes, then risk life and limb to use them. Many do not drive or own a car. There is no public transportation. The internet service in the area is not dependable. Many active persons in the community live on the surrounding farms, and a number of them choose to keep a post box in Bentonville. My family lived on a farm one mile distant and maintained their postal box as well as a mailbox on the rural route. They did this for the safety and the convenience of having the help of the postmaster and staff, the purchase of stamps, special mailings, as well as having become accustomed to the regular friendly service. After my parents' retirement checks were stolen from the rural route mailbox, they changed the mailing address on all of their important communications to Box 237, Bentonville, Ohio 45105. The theft of their checks led to a stressful court experience and the hiring of an attorney to get justice and compensation. People whose homes are distant from their mailboxes need the personal coverage the Post Office provides to avoid such experiences.

The removal of the US Post Office in Bentonville would reduce the town to just a "wide spot in the road", speeding the traffic, fracturing the social structure and thus lending to the demise of a community that has been healthy and thriving for nearly 175 years.

It is my sincere hope that you will honor the true American way of life that exists there and allow the Bentonville, Ohio, 45105 Post Office to continue service. (A2011-58)

Best regards,

Rep. Jane B. Johnson

Jane B. Johnson, NH State Representative
P. O. Box 10234
Swansey, NH 03446